

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 23-61703-CIV-SINGHAL/VALLE

CHG MEDICAL STAFFING, INC., d/b/a  
RNNETWORK a Delaware Corporation,

Plaintiff,

v.

RACHEL SHAFFER, an individual,  
LISLEY ROSSI, an individual,  
AHS STAFFING, LLC, an Oklahoma  
Limited Liability Company,

Defendants.

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**PLAINTIFF'S WITNESS AND EXHIBIT LISTS**

Pursuant to this Court's Paperless Order directing the parties to file exhibit and witness lists for the October 31, 2023 hearing on Plaintiff's Motion for Preliminary Injunction [D.E. 30], Plaintiff, CHG Medical Staffing Inc. d/b/a RNnetwork ("RNN"), hereby submits the following witness and exhibit lists.

**PLAINTIFF'S WITNESS LIST**

	Name	Address
1	Eleonore Ruffy	c/o RNN's Counsel JACKSON LEWIS PC One Biscayne Tower, Suite 3500 2 S. Biscayne Blvd. Miami, FL 33131 Telephone: (305) 577-7603
2	Amy Reed	c/o RNN's Counsel
3	Keela Briles	c/o RNN's Counsel

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4	Rachel Shafer	c/o Rachel Shafer's Counsel SHOLMO Y. HECHT, P.A. 3076 N. Commerce Pkwy. Miramar, Florida 33025 Telephone: (954) 861-0025
5	Lisley Rossi	c/o Lisley Rossi's Counsel SCONZO LAW OFFICE, P.A. 3825 PGA Blvd., Suite 207 Palm Beach Gardens, Florida 33410 Telephone: 561-729-0940
6	AHS Staffing, LLC ("AHS") Corporate Representative	c/o AHS's Counsel COLE, SCOTT & KISSANE, P.A. Cole, Scott & Kissane Building 9150 South Dadeland Boulevard, Suite 1400 Miami, Florida 33256 Telephone: (786) 268-6415
7	All witnesses designated by Defendants	
8	Rebuttal witnesses	

Plaintiff reserves the right to call as a witness any person designated as a witness or potential witness or called by the Defendants in this matter, any person needed to authenticate documents, and/or for impeachment purposes, or as rebuttal witnesses.

**PLAINTIFF'S EXHIBIT LIST**

<b>PL. NO.</b>	<b>DESCRIPTION OF EXHIBITS</b>
1	Rachel Shafer Pay Records
2	Rachel Shafer Employment Agreement - 7/26/12
3	Lisley Rossi Employment Agreement - 7/21/14
4	Rachel Shafer Performance Improvement Plan - 2/17/23
5	Letter from Keela Briles to Rachel Shafer Re: CHG Important Information - 3/30/23
6	Letter to AHS Re: Violation of Non-Compete Agreement - 7/26/23
7	AHS Response to RNN Letter - 7/31/23
8	Email from Alaina Robertson to Chrissy Evans dated Re: Nurses leaving to work with Rachel with inbound messages from Elizabeth Streber and Jordan Newstadt - 7/14/23
9	Email from Alaina Robertson to Chrissy Evans dated Re: Nurses leaving to work with Rachel - 7/14/23
10	Email from Eleonore Ruffy to Kerry Black Re: non-solicitation violations - 6/22/23
11	Email from Rachel Shafer to herself dated 03.28.23 re"Rachel Shafer shared "Non-compete Non Solicit Process RNN 10.2.2022" with you.
12	Email from Rachel Shafer to herself dated 03.10.23 FW:W/a and TOA
13	Email from Rachel Shafer to herself dated 03.09.23 FW: W/A Week 10
14	Email from Rachel Shafer to herself dated 03.10.23 RE December Commission Calc Sheet
15	Email from Rachel Shafer to herself dated 03.09.23 RE Fwd: corporate-careers/jobs/

16	Email from Rachel Shafer to herself dated 03.15.23 re extension on assignment
17	Employee Handbook June 2021
18	Email from Rachel Shafer to herself dated 03.12.23 text messages with N. T. Re: New Contact Information
19	Email from Rachel Shafer to herself dated 03.09.23 RE Recap Week 2.27.23
20	Email from Rachel Shafer to herself dated 03.09.23 RE Updated Resume
21	Email from Rachel Shafer to herself dated 03.10.23 with link to job postings
22	Email from Keela Briles to Andrea Moreira dated 08.09.23 re Notes from an anonymous caller re: Rachel Shafer
23	Email from Emily Spork to Christina Eggert dated 08.30.23
24	Email from Rachel Shafer to herself 3.3.23 re ZBOR-Trauma Job Assignment
25	AHS Website
26	Screenshot of Computer Property Logging On Policy Acknowledgement
27	Email from Nela De La Vega to Alicia Palasay dated 03.07.23 RE: Note Added – Leah Gray
28	Letter to Rachel Shafer dated 07.14.23 RE Cease and Desist Violation of Non-Compete Agreement
29	Text Message Between Lisley Rossi and S.G. dated 06.20.23
30	Excel RS W&A Week 6 2023
31	Excel Team Shafer W&A Week 10 2023
32	Letter to Lisley Rossi dated 07.14.23 RE Cease and Desist Violation of Non-Compete Agreement
33	Letter from Shlomo Y. Sam Hecht dated 7.21.23.pdf

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34	Rachel Shafer's LinkedIn
35	Lisley Rossi's LinkedIn
36	Affidavit of Lisley Rossi
37	All admissible exhibits listed on any Defendant's exhibit list
38	Rebuttal Exhibits

Dated: October 27, 2023

Respectfully submitted,

By: s/ Jennifer A. Schwartz

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*Counsel for the Plaintiff**CHG Medical Staffing, Inc.***CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document is being served on October 27, 2023, on all counsel of record on the Service List below via transmission of Notices of Electronic Filing generated by CM/ECF.

s/ Jennifer Schwartz  
Jennifer Schwartz, Esq.

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